

**IN THE FEDERAL DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

NILOFER NANLAWALA,

Plaintiff,

v.

CITY OF CHICAGO, a municipal
corporation,

Defendant.

Case No.: 21-cv-5624

Hon. Judge Matthew F. Kennelly

JOINT STATUS REPORT

Pursuant to the Court's July 13, 2022 Order (Dkt. No. 42), the Parties jointly submit this status report on the progress of discovery:

1. On July 13, 2022, the Court ordered the Parties to report on 1) the names of the individuals who are to be deposed and 2) the dates scheduled for the depositions. *Id.*
2. On July 15, 2022, the City responded to Plaintiff's request for production and produced over 2500 documents. On July 27, 2022, the City filed an answer to the complaint and provided Plaintiff with its answers to Plaintiff's first set of interrogatories. On August 4, 2022, the City supplemented its production with additional documents.
3. As of this filing, the City deposed plaintiff Nilofer Nanlawala on August 10, 2022. Hany Shalabi's deposition was originally scheduled for August 11, 2022, and has been rescheduled to October 7, 2022, at the City's request due to counsel's conflict with an unrelated IDHR investigation conference.

4. Plaintiff provided notice of depositions for the following individuals and dates: Ofcr. Michael Pelrine on October 4, 2022; Lt. Garrity on October 6, 2022; Lt. Andrew Block on October 19, 2022; Ofcr. Laren Youssef on October 20, 2022; Kathryn Perry-Hopkins of H.R on October 26, 2022; and, Deputy Chief Pontecore on October 27, 2022.
5. Lt. Michael Fine (retired) is being subpoenaed for deposition on October 21, 2022 and Cmdr. Melvin Roman (retired) is being subpoenaed for deposition on October 25, 2022.
6. Plaintiff has proposed to the City deposition dates for Watch Secretary Melyssa LaPorte and the parties are working to confirm these dates.
7. The City intends to depose two treating health care professionals, Dr. Ibrahim-Joudeh and Dr. Siddiqui. The City has reached out to both and is working to find agreeable deposition dates.

For the above and foregoing reasons, the Parties respectfully request this Honorable Court deemed that the parties have complied with the Court's Order dated July 13, 2022.

Dated: August 22, 2022

Respectfully submitted,

By: /s/ Christina Abraham

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